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THE CITY OF NEW YORK LAW DEPARTMENT

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Assistant Corporation Counsel Telephone: (212) 356-2546 bahlberg@law.nyc.gov

February 19, 2025

VIA ECF

Hon. Colleen McMahon United States District Judge United States District Court, SDNY Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007-1312

Ok, conference adjourned.

Re: JobPath Partners, LLC v. City of New York, Betis Direct, LLC, and CDW Government LLC

Case No. 1:24-cv-09026-CM

Dear Judge McMahon:

We are Assistant Corporation Counsel in the office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, assigned to the defense of the above matter on behalf of Defendant the City of New York (the "City").

On Friday, February 14, 2025, the City filed its motion to dismiss the Complaint pursuant to FRCP 12(b)(6). Co-Defendant CDW-Government, LLC ("CDW-G") also filed a motion to dismiss the same day. In order to address the complex legal issues raised in the City's motion, the parties would like to request an extension of time for the parties to submit responsive papers to the City's motion from February 28, 2025 to March 7, 2025, and an extension of the City's time to submit reply, from March 7, 2025, to March 21, 2025. This is the first request for an extension of these deadlines, and all parties have consented to the proposed briefing schedule.

Additionally, pursuant to ¶ 4 of the Court's November 26, 2024 Order Scheduling an Initial Pre-Trial Conference, we respectfully request that the Court adjourn the Initial Pre-Trial Conference until after the motions are fully briefed. All parties have consented to this request.

We thank the Court for its time and consideration in this matter.

Respectfully Submitted,

Amanda Papandrea

Blake Ahlberg

Assistant Corporation Counsel

cc: All counsel of record (Via ECF)